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7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF NIMA HEFAZI IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF ITS PATENT
SHOWDOWN MOTION FOR SUMMARY
JUDGMENT**

1 I, Nima Hefazi, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am of counsel at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
7 Seal Portions of its Patent Showdown Motion for Summary Judgment (“Motion”). If called as a
8 witness, I could and would testify competently to the information contained herein.

9 3. Google seeks an order sealing the materials as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Motion	Portions highlighted in green	Google
Exhibit 1	Entire Document	Google
Exhibit 2	Entire Document	Google
Exhibit 3	Entire Document	Google
Exhibit 4	Entire Document	Google
Exhibit 5	Entire Document	Google
Exhibit 6	Entire Document	Google
Exhibit 8	Entire Document	Google
Exhibit 10	Entire Document	Google
Exhibit 11	Entire Document	Google
Exhibit 13	Portions highlighted in green	Google
Exhibit 19	Entire Document	Google
Exhibit 23	Entire Document	Google

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2 4. Google's Motion and Exhibits 1, 2, 3, 4, 5, 6, 8, 10, 11, 13, 19, and 23 contain
3 references to Google's confidential business information and trade secrets, including details regarding
4 source code, architecture, and technical operation of Google's products and functionalities that Sonos
5 accuses of infringement. The specifics of how these functionalities operate is confidential information
6 that Google does not share publicly. Thus, public disclosure of such information could lead to
7 competitive harm to Google as competitors could use these details regarding the architecture and
8 functionality of Google's products to gain a competitive advantage in the marketplace with respect to
9 their competing products. I also understand that a less restrictive alternative than sealing these
10 exhibits would not be sufficient because the information sought to be sealed is Google's confidential
11 business information and trade secrets but is necessary to Google's Motion.

12 I declare under penalty of perjury under the laws of the United States of America that to the
13 best of my knowledge the foregoing is true and correct. Executed on April 14, 2022, in Los Angeles,
14 California.

15 DATED: April 14, 2022

16 By: /s/ Nima Hefazi
17 Nima Hefazi
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ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Nima Hefazi has concurred in the aforementioned filing.

DATED: April 14, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven